

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IAN MACLEOD, )  
)  
Plaintiff, )  
)  
-vs- ) Case No. 1:19-cv-000683  
)  
MIDAMERICAN ENERGY )  
SERVICES, LLC, )  
)  
Defendant. )  
-----)

REPORT OF PROCEEDINGS from the  
discovery deposition of IAN MACLEOD taken by  
Paul W. O'Connor, a CSR within and for the State of  
Illinois, pursuant to the provisions of the United  
States Supreme Court pertaining to the taking of  
depositions for the purpose of discovery, at 233 West  
Wacker Drive, Suite 5500, Chicago, Illinois, 60606,  
commencing at 1:00 p.m. on July 16, 2020

1 APPEARANCES:

2  
3 LANGONE BATSON & LAVERY

4 17 North Wabash Avenue, Suite 500

5 Chicago, Illinois, 60602

6 By: MR. MARK LAVERY

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8 Appearing on behalf of the Plaintiff;

9  
10  
11 SEGAL McCAMBRIDGE SINGER & MAHONEY, LTD

12 233 South Wacker Drive, Suite 5500

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14 By: MR. BENJAMIN J. NELLANS

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17 Appeared on behalf of the Defendant.

18  
19  
20  
21  
22 Also Present:

23  
24 MR. DAVID WHITE

1                   So my salary could have been, my wages  
2                   could have been between three and \$500,000 right now. So  
3                   if you look back, if I made \$200,000 my second year, so I  
4                   would have made 100,000 my first year that I was  
5                   guaranteed 87. So I want the wages that I lost since  
6                   then. Maybe -- my salary, the new salary I took was  
7                   40,000. I just took the job because so I could start  
8                   working. So figure it out.

9                   First year is 87,000 plus commissions,  
10                  possible commissions. The next year is up to 200,000.  
11                  This was all discussed in the interview with Randy  
12                  Marzen. How I was going to build a plan to get to the  
13                  four to \$500,000. That's why I took the job.

14                Q.    So one of the damages you're claiming is the  
15                    difference in salary, that is one thing you would like to  
16                    recover?

17                A.    Yes.

18                Q.    Another thing is the lost potential from the  
19                    commissions?

20                A.    Yes.

21                Q.    It sounds like you also are claiming mental and  
22                    emotional damages?

23                A.    Yes.

24                Q.    That's because you saw a psychiatrist?

1           A.    Psychiatrist and a psychologist.

2           Q.    What was the name of the psychiatrist?

3           A.    You have got the documentation. The document  
4 was sent to you but I have got it.

5                     Dr. Kellie, K-E-L-L-I-E, I will spell it,  
6 V-A-I-D-Y-A. I saw her December 20, 2017. This is the  
7 insurance claim.

8           Q.    For the record you're reviewing the insurance  
9 claim to doctor, in Dr. Kellie's name?

10          A.    Yeah.

11          Q.    I don't need to mark it at this time but we can  
12 review it. Was she the psychiatrist or psychologist?

13          A.    Who prescribes meds, psychiatrist or  
14 psychologist. I call it psychiatrist -- whoever can  
15 prescribe meds, that's who it was. One of the them  
16 doesn't. The psychiatrist I think.

17          Q.    Who is the other then, Dr. Kellie and --

18          A.    The one I'm seeing now is -- I don't recall his  
19 name. I'm not going to look for it but I'm seeing  
20 somebody now. I switched firms.

21                 MR. NELLANS: What I'd ask is to the extent it's  
22 responsive, have your counsel timely submit the name and  
23 documentation for that individual.

24          Q.    How long have you been seeing Dr. Kellie?

1           A.    I only saw her once and I saw another person, I  
2           can't recall the name. I saw a psychiatrist, I saw the  
3           psychologist and I just can't, I slip -- who can  
4           prescribe meds, whichever can is the one.

5                        So then I quit going to her because once I  
6           started working again, I would just call and get meds  
7           renewed, I would see her more than once. So I was on  
8           Lorazepam.

9           Q.    She prescribed that to you?

10          A.    Yes.

11          Q.    How long did you take Lorazepam?

12          A.    Maybe 3 or 4 months.

13          Q.    Why did you stop taking Lorazepam?

14          A.    The spring got nice and I didn't really feel  
15          pills were doing anything to me. They made me drowsy  
16          during the day. I started running. It was summer. The  
17          kids were getting out of school so I felt better.

18                        I was actively interviewing and feeling  
19          good about myself and I'm back on them right now.

20          Q.    Why are you back on them right now?

21          A.    Because my wife has terminal cancer.

22          Q.    I'm sorry to hear that.

23                        Was the, your termination at MidAmerican  
24          the only reason why you originally saw Dr. Kellie?

1 A. Yes.

2 Q. And the other doctor whose name you cannot  
3 recall, was your termination at MidAmerican the only  
4 reason you saw him or her?

5 A. Yeah.

6 Q. You switched --

7 A. Can I answer that correctly? It's one of the  
8 reasons. I was feeling so down, my wife made me, she  
9 basically made the appointment for me because I was just  
10 in a dark place. So that was one of the reasons.

11 There's a lot of things that go into it.  
12 I couldn't find a job. I was getting rejected from  
13 companies that were giving me offers before I went to  
14 MidAmerican. So there's one rejection after another and  
15 so I was let go in October, I started to go on meds in  
16 December. Those meds usually take 30 days to kick in.

17 So that was one of the reasons. That  
18 wasn't the sole reason I went. It was overall mental  
19 health, that was the main cause of it.

20 Q. Okay. All right. Moving on. I'd like to talk  
21 to you a little bit about your background if that's okay.

22 A. Yeah.

23 Q. Where did you go to undergrad?

24 A. University of Iowa.